

Exhibit 42

(REDACTED)

This Exhibit contains the specific pages of the deposition Plaintiffs are referencing. The entire deposition was separately filed in the record pursuant to LR 5.1 and the M.D. Ga. CM/ECF Administrative Procedures Manual.



Deposition of:
30(b)(6) Marquita Crawford, Vol. II
August 23, 2021

In the Matter of:
**Barrientos, Wilhen Hill v. CoreCivic
Inc.**

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IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA COLUMBUS DIVISION

WILHEN HILL BARRIENTOS, GONZALO
BERMUDEZ GUTIÉRREZ, and KEYSLER
RAMON URBINA ROJAS, individually
and on behalf of all others
similarly situated,

Plaintiffs,

V.

Case No.

CORECIVIC, INC.,

4:18-cv-00070-CDL

Defendant.

VIDEOCONFERENCE DEPOSITION OF
MARQUITA CRAWFORD VOLUME II

DATE: Monday, August 23, 2021

TIME: 9:36 a.m.

LOCATION: Remote Proceeding- GA

146 CCA Road

Lumpkin, Georgia, 31815

REPORTED BY: Daniel Almekinder, Notary Public

JOB No. : 4760608

A P P E A R A N C E S

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18 ON BEHALF OF WITNESS TRINITY SERVICES GROUP, LLC:

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1 A P P E A R A N C E S (Cont.)

2 ON BEHALF OF WITNESS TRINITY SERVICES GROUP, LLC

3 (CONT.):

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10 ALSO PRESENT:

11 Leonora Renda, Plaintiff's Expert (by

12 videoconference)

13 Scott Long, Veritext Observer (by

14 videoconference)

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1 it.)

2 Q Has your last name changed in the past ten
3 years?

4 A Yes.

5 Q Was it previously Lyles?

6 A Yes.

7 Q And what year did it change to Crawford?

8 A My anniversary is today, so 2014, I think.

9 I think it was 2014 is when I changed my name.

10 Q Congratulations on your anniversary.

11 A Thank you.

12 Q What is your educational background?

13 A I am -- I graduated from high school. Yeah.

14 Also, I did a year in college.

15 Q And do you speak any language other than
16 English?

17 A No.

18 Q Going back to your last name, did you use
19 the last name Lyles at work later than 2014?

20 A Some people still called me by Lyles just
21 because when I started working here, that was my last
22 name. Yes. But legally, I'm Crawford.

23 Q And did 2014, you changed it with Trinity to
24 Crawford?

25 A Yes.

1 Q Have you ever worked for CoreCivic?

2 A No.

3 Q And what is your current title at Trinity?

4 A Food Service Director.

5 Q How long have you held that title?

6 A Five years.

7 Q And prior to being Food Service Director at
8 Trinity, what were you doing?

9 A I was the Assistant Food Service Director.

10 Q How long were you Assistant Food Service
11 Director?

12 A Two years.

13 Q And you were Assistant Food Service Director
14 for Trinity at Stewart?

15 A Yes.

16 Q And prior to being Assistant Food Service
17 Director at Stewart, what were you doing?

18 A I was a Food Service Supervisor for Trinity.

19 Q At Stewart?

20 A Yes.

21 Q How long were you a Food Service Supervisor?

22 A Four to five years.

23 Q And other than Food Service Director,
24 Assistant Food Service Director, Food Service
25 Supervisor, have you held any other positions at

1 Trinity?

2 A No.

3 Q So you have been employed by Trinity at
4 Stewart for approximately 12 years?

5 A Yes. Almost 13.

6 Q And what are your duties and
7 responsibilities as Food Service Director?

8 A I oversee the food program here. The
9 purchasing. The quality of the food. I direct all of
10 my workers. Delegate jobs to my supervisors. And
11 financial reports.

12 Q Anything else?

13 A Yes. It's -- it's a lot more, but those are
14 the basics.

15 Q And what were your job duties as the
16 Assistant Food Service Director?

17 A Some of the same things. Most of the same
18 things. Ordering foods. Making sure food is good.
19 The quality of the food is good. Food safety. Doing
20 orientation with the trainees. Training them. Those
21 sorts of things.

22 Q As the Food Service Director now, do your
23 job duties include orientation and training of
24 detained workers?

25 A Yes.

1 Q And what were your job duties and
2 responsibilities as a Food Service Supervisor?

3 A Delegating jobs to the detainee workers.
4 Cleaning the kitchen. Assigning duties. Just
5 completing paperwork. Supervising the line and
6 supervising the production area. And ensuring food
7 safety.

8 Q All three positions you've held at Trinity
9 have required you to ensure food quality and safety?

10 A Yes.

11 Q And all three positions that you've held
12 with Trinity at Stewart have involved interactions
13 with the volunteer work program?

14 A Yes.

15 Q Is there anyone other than you who has
16 primary responsibility for overseeing Trinity's
17 operations at Stewart?

18 A My assistant.

19 Q Who is your assistant?

20 A Derico Countryman. D-E-R-I-C-O Countryman,
21 C-O-U-N-T-R-Y-M-A-N.

22 Q What is Derico's title?

23 A He's the Assistant Food Service Director.

24 Q How long has he been with Trinity?

25 A Three years.

1 Q Do you know if Derico Countryman used to
2 work for CoreCivic?

3 A He did.

4 Q Do you know what his position was with
5 CoreCivic?

6 A He was a counselor.

7 Q Have you worked at any Immigrant Detention
8 Facilities other than Stewart?

9 A I have not worked, but I have helped out at
10 other facilities.

11 Q What other facilities have you helped out
12 at?

13 A Adams County.

14 Q Is that located in Louisiana?

15 A It's in Mississippi.

16 Q Adams County, Mississippi. How long were
17 you at Adams County?

18 A Two weeks.

19 Q And what were you doing there?

20 A Assisting with the food service program.

21 Q Is there a work program at Adams County?

22 A It is.

23 Q Did your two weeks of work at Adams County
24 involve interactions with the detained workers?

25 A Yes.

1 Q Have you ever worked at a correctional
2 facility?

3 A No. Currently I work at one, but not
4 previously.

5 Q My question is more have you ever worked for
6 a correctional facility that houses individuals
7 convicted of crimes?

8 A No.

9 Q Okay. I want to ask you some questions
10 about Trinity staffing at Stewart. How many employees
11 does Trinity employ to work in the Stewart kitchen?

12 A We have a staffing pattern of eight Trinity
13 supervisors.

14 Q In addition to Food Service Director?

15 A In addition to Food Service Director and
16 Assistant Food Service Director.

17 Q Okay, Trinity then employs 10 people to work
18 in the kitchen at Stewart?

19 A Yes.

20 Q Eight Food Service Supervisors, an Assistant
21 Food Service Director, and a Food Service Director.
22 Is that right?

23 A That's correct.

24 Q And how many Trinity staff work on each
25 shift?

1 Q So there's always at least one kitchen
2 officer in the kitchen? Correct?

3 A Correct.

4 Q And depending on the number of detained
5 workers in the kitchen at any given time, that informs
6 how many Trinity staff you need there?

7 A Yes.

8 Q And that's because the Trinity staff
9 supervise the detained workers?

10 A Correct.

11 Q Have there been occasions when the total
12 Trinity staff, which we determined earlier was ten
13 people, was less than ten people?

14 A What are you asking? I'm sorry.

15 Q I'm asking if there are times when Trinity a
16 short-staffed such that there are --

17 A Yes.

18 Q -- less than ten people?

19 A Yes.

20 Q And how often does that happen?

21 A It has happened as often as we -- we don't
22 have any workers. If we don't have the staff, you
23 know, of course, we'll be short-staffed. And if we
24 are short-staffed, we would have -- we would ask for
25 someone to come in from another facility to help out.

1 Q And you communicated over that e-mail
2 address?

3 A No.

4 Q Why not?

5 A I didn't have a need to.

6 Q Do you know if other Trinity employees use
7 that e-mail address to communicate?

8 A I don't.

9

[REDACTED]

[REDACTED]

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BY MS. STEWART:

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Q Have you ever reported it in real-time to

22

CoreCivic like Mr. Marrero did here?

23

A Not exactly like he has there, but I have

24

made them aware when we're short.

25

Q And the goal of giving that information is

1 so that you can get more detained workers in the
2 kitchen?

3 A Yes.

4 Q And prevent any delays in the meal service?

5 A That's correct.

6 Q You testified earlier that as Food Service
7 Director, you are responsible for tracking the
8 attendance of detained workers in the kitchen.
9 Correct?

10 A Yes.

11 Q And you do that on the 11-1K form. Correct?

12 A On the 11-1K form. Yes.

13 Q SO when you realize that the detained
14 workers who were scheduled to work that day didn't
15 show up, what do you? Can you walk me through your
16 next steps?

17 A If the detainees do not show up to work?

18 Q Yes. What do you do?

19 A We call the unit and see where the detainees
20 are. If they're in court and they're going to report
21 to work after court, then we don't need the volunteer.
22 We can just wait until they get there. If they're in
23 medical and they're going to be in medical for a long
24 time, we can wait on those people to report to work.
25 Now if -- if it's over two hours, yeah, we'll go ahead

1 worked more than eight hours?

2 A No. We -- at the end of the shift, we send
3 them back to the unit. The officer is in charge of
4 the timesheets and everything. They handle all of --
5 all of that. We just assign them to their work
6 groups. But more than likely, they will work less
7 than eight hours. Once everything is done in the
8 kitchen, they're allowed to go back to the unit.

9 Q Well, what about in instances when the meal
10 service goes over eight hours? In that case, would
11 they work more than eight hours?

12 A The meal service won't go over eight hours.

13 Q Has it ever gone over eight hours?

14 A No.

15 Q You referenced that it is the unit managers
16 who track the detained worker's time. Correct?

17 A No. The unit team, I said. I'm not sure if
18 it's the unit manager, the counselors, or whoever's in
19 the unit that's handling the detainee pay. They track
20 it. And the kitchen officer, they log it in. They
21 have a timesheet they log in. So the unit team does
22 it.

23 Q Trinity doesn't have any responsibility with
24 respect to tracking the times the detained workers
25 work?

1 stated here that kitchen workers will not get a phone
2 card if they only show up to work after Trinity
3 requested volunteers?

4 A No. This -- this has to be a form that they
5 had in the unit because I don't have this form. This
6 is not a part of my packet.

7 MS. STEWART: Okay. We can take down
8 Exhibit 32.

9 BY MS. STEWART:

10 Q Are you familiar with the practice of
11 allowing detained kitchen workers were to receive
12 extra food as a benefit of working in the kitchen?

13 A That -- they do get extra food. They eat
14 the left-over food, the short line. They do. But
15 that's not a -- a put in in writing for them to say
16 hey, that's -- you're going to get extra food if you
17 come to the kitchen. That's just part of working the
18 kitchen before we were done with everything that's --
19 we can't utilize the food anymore, yes they are
20 allowed to eat food during their lunch break.

21 Q So there's a general practice of allowing
22 detained kitchen workers to eat extra food including
23 the leftovers?

24 A Yes.

25 Q In your experience, does the extra food

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NATASCHA WISE